

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
BALTIMORE DIVISION**

Case No. 1:15-cv-00947

DICKSTEIN SHAPIRO LLP, a District of)
Columbia limited liability partnership)
)
Plaintiff,)
)
v.)
)
SOJOURNER-DOUGLASS COLLEGE, a)
Maryland nonprofit corporation based in Baltimore)
City)
)
Defendant.)
)

**PLAINTIFF'S REQUEST FOR CLERK'S ENTRY OF DEFAULT AGAINST
DEFENDANT SOJOURNER-DOUGLASS-COLLEGE AND
DECLARATION OF NICHOLAS S. CHEOLAS IN SUPPORT THEREOF**

Plaintiff Dickstein Shapiro LLP (“Dickstein”), by and through its attorneys and pursuant to Fed. R. Civ. P. 55(a), respectfully requests the Clerk of the Court enter a default as to Defendant Sojourner-Douglass College (“SDC”) and states as follows:

1. On April 1, 2015, Plaintiff Dickstein Shapiro LLP filed case No. 1:15-cv-00947-WMN in the United States District Court for the District of Maryland, Baltimore Division, naming Defendant Sojourner-Douglass College as the lone Defendant.
2. Plaintiff alleged claims for breach of contract and account stated against SDC, seeking \$98,599.41 in unpaid legal fees and costs.
3. The Court issued a summons for Defendant SDC on April 2, 2015.
4. The summons, Complaint, and other case documents were served on SDC’s registered agent by certified mail, restricted delivery pursuant to Fed. R. Civ. P. 4(h) and Md.

Rule 2-121 on April 4, 2015. See Declaration of Cindy N. Matera and Proof of Service attached as **Exhibit A.** (ECF No. 4).

5. Pursuant to Fed. R. Civ. P. 12(a)(1)(A)(i), SDC had 21 days to file an answer or other responsive pleading. SDC's responsive pleading was due on April 27, 2015. See **attached Declaration of Nicholas S. Cheolas in Support of Request for Entry of Default.**

6. Defendant SDC has yet to file any responsive pleading, nor has any attorney entered his or her appearance on behalf of SDC.

WHEREFORE, Plaintiff Dickstein Shapiro LLP respectfully requests that the Clerk enter a default against Defendant SDC.

Dated: May 4, 2015

Respectfully submitted,

By: /s/ Nicholas S. Cheolas
Nicholas S. Cheolas
D. Md. Bar No. 07202
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Counsel for Plaintiff Dickstein Shapiro LLP

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DICKSTEIN SHAPIRO LLP, a District of Columbia limited liability partnership)	
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Plaintiff,)	
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v.)	Case No. 1:15-cv-00947
)
SOJOURNER-DOUGLASS COLLEGE, a Maryland nonprofit corporation based in Baltimore City)	
)
Defendant.)	
)

**DECLARATION OF NICHOLAS S. CHEOLAS
IN SUPPORT OF REQUEST FOR ENTRY OF DEFAULT**

I, Nicholas S. Cheolas, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am over 18 years of age, and I am an associate attorney employed by Dickstein Shapiro LLP at 1825 Eye Street, NW, Washington, DC 20006, telephone 202-420-3392. I am also counsel for Plaintiff Dickstein Shapiro LLP in this matter.
2. Plaintiff Dickstein Shapiro LLP filed this action against Defendant Sojourner-Douglass College via ECF on April 1, 2015.
3. Defendant Sojourner-Douglass College was served with a copy of the issued summons, Complaint, and other case-initiating documents via certified mail, restricted delivery on April 4, 2015. See **Exhibit A**.
4. A responsive pleading was due by April 27, 2015.
5. Defendant Sojourner-Douglass College has failed to appear, plead, or otherwise defend within the time allowed under Fed. R. Civ. P. 12, and is now in default.

6. Plaintiff hereby requests that the Clerk of Court enter a default against Defendant Sojourner-Douglass College.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: May 4, 2015

By: 
Nicholas S. Cheolas

CERTIFICATE OF SERVICE

I, Nicholas S. Cheolas, hereby certify that on May 4, 2015, I filed a true and correct copy of **PLAINTIFF'S REQUEST FOR ENTRY OF DEFAULT AGAINST DEFENDANT SOJOURNER-DOUGLASS COLLEGE** and the **DECLARATION OF NICHOLAS S. CHEOLAS IN SUPPORT OF REQUEST FOR ENTRY OF DEFAULT** via the Court's CM/ECF system, thereby effectuating service upon all counsel of record by electronic means. I also caused a copy to be served via first class mail, postage prepaid to:

Mr. Donald L. Hutchins
Vice President for Administrative and Fiscal Affairs and Registered Agent
Sojourner-Douglass College
200 N. Central Avenue
Baltimore, Maryland 21202

/s/ Nicholas S. Cheolas

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